

The CT Chapter of the American Academy of Pediatrics is submitting this testimony in opposition to HB 6798, AAC AN ACT REQUIRING LABELING OF BABY FOOD AND INFANT FORMULA CONTAINING GENETICALLY ENGINEERED ORGANISMS

The Academy of Pediatrics has a policy that states that breast-feeding is the very best way to feed a baby for the first year of life. However, that may not be possible, and it is a choice that every parent must make for themselves along with their pediatrician.

When it is not possible to breast-feed a child, the AAP has no policy, and there is no scientific evidence stating that consumption of food containing GMOs is unsafe for babies and children. Infant formula is the most highly regulated food in the world and continues to be the only safe, nutritious and recommended alternative to breast milk. As is the case with many other foods, some infant formula ingredients can be derived from widely cultivated genetically-engineered crops. Here are some facts:

- The U.S. Food and Drug Administration (FDA) has concluded that all genetically-engineered ingredients that are currently used in foods, including infant formulas, are safe and the same in composition, nutritional value and quality as ingredients not derived through biotechnology.
- FDA has thus determined that the labeling of foods containing genetically-engineered ingredients is unnecessary, a position supported by numerous regulatory agencies and health organizations, including the American Medical Association.
- An extensive body of national and international scientific evidence supports the safety of biotech ingredients for use in foods consumed by all populations, including adults, infants and young children. There is no evidence that infants metabolize genetically engineered foods or ingredients differently than children or adults. There is therefore no compelling health, safety or nutritional rationale that supports labeling to disclose the presence of genetically engineered ingredients only in foods intended for infants and young children.
- Mandatory labeling of infant formula containing genetically engineered ingredients is unnecessary, provides no public health benefit and may create alarm among caregivers, potentially leading to the use of unsafe infant feeding methods, like homemade formula, that are not recommended by any medical authority and extremely dangerous to infant health.
- Widely available recipes, blogs and social media discussions indicate that caregivers are turning to homemade formula due to fear and a misunderstanding of biotechnology. Mandatory labeling of infant formula is likely to exacerbate this trend.
- Several varieties of certified organic infant formula are already widely available. Organic certification standards prohibit the use of genetically engineered inputs so consumers wishing to avoid genetically engineered ingredients already have the option to do so.
- State-specific special labeling requirements for infant formula, a product provided by the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC program), are likely to increase costs of program administration for states, especially those that participate in multi-state contracts such as Connecticut, and the federal government.
- Federal preemption is much stronger with infant formula than for foods in general. FDA already regulates infant formula production, formulation, labeling, GMOs, quality factors, record retention, registration, premarket submission review, notice requirements, recalls, unique adulteration and misbranding provisions, etc. This complete federal regulation arguably does not allow for states to implement different requirements for infant formula, in terms of labeling or otherwise.

We thank the committee for the concern of all children in the state, and for their parents. We do not feel, however, that this bill will make anyone safer, and in fact, may challenge parents both financially and emotionally, and cause harm to children.